

AB:LRO

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

21-598 M

----- X

UNITED STATES OF AMERICA

- against -

ABIDEMI RUFAI,
also known as “Sandy Tang,”

Defendant.

AFFIDAVIT IN SUPPORT OF
REMOVAL TO THE
WESTERN DISTRICT OF
WASHINGTON

(Fed R. Crim. P. 5)

----- X

EASTERN DISTRICT OF NEW YORK, SS:

ANDREA L. DESANTO, being duly sworn, deposes and states that she is a Special Agent with the Federal Bureau of Investigations, duly appointed according to law and acting as such.

On May 14, 2021, the United States District Court for the Western District of Washington issued an arrest warrant commanding the arrest of the defendant ABIDEMI RUFAI for violations of Title 18, United States Code, Section 1343 (wire fraud).

The source of your deponent’s information and the grounds for his belief are as follows:¹

1. On or about May 14, 2021, the United States District Court for the Western District of Washington signed a Criminal Complaint (the “Complaint”) charging the

¹ Because the purpose of this affidavit is to set forth only those facts necessary to establish probable cause for removal, I have not described all of the relevant facts and circumstances of which I am aware.

defendant ABIDEMI RUFAI with violations of Title 18, United States Code, Section 1343 (wire fraud). A warrant was issued for the defendant's arrest. True and correct copies of the Complaint and arrest warrant are attached as Exhibits A and B, respectively.

2. On or about May 13, 2021, law enforcement received information that ABIDEMI RUFAI would be boarding Royal Dutch Airlines flight KL644 at John F. Kennedy International Airport ("JFK Airport") in Queens, New York to Amsterdam, with a final destination of Lagos, Nigeria.

3. At approximately 7:45 p.m. on May 14, 2021, RUFAI arrived at JFK Airport. Law enforcement officers met RUFAI, who waived his Miranda rights and agreed to speak to law enforcement officers without an attorney present. While speaking with law enforcement officers, RUFAI verified his name and date of birth.

4. In his possession, RUFAI had, among other things, a Nigerian identification card and various credit cards listing a name matching that of the defendant ABIDEMI RUFAI. In addition, RUFAI had in his possession a Nigerian passport, which listed a name and date of birth matching that of the defendant ABIDEMI RUFAI.

5. RUFAI'S appearance matched photographs from the defendant ABIDEMI RUFAI's passport and identification cards. I further recognized RUFAI from the defendant ABIDEMI RUFAI's 2019 visa application photograph and from secondary inspection photographs taken by United States Customs and Border Patrol in 2017 and 2020. RUFAI's appearance also matched photographs obtained from the defendant ABIDEMI RUFAI's social media accounts as well as photographs obtained from the defendant ABIDEMI RUFAI's Google Drive account pursuant to a judicially authorized search warrant, as detailed in the Complaint.

6. Based on the foregoing, I submit that there is probable cause to believe that the defendant is the ABIDEMI RUFAI wanted in the Western District of Washington.

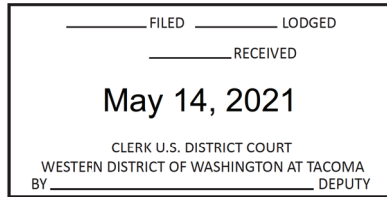
WHEREFORE, your deponent respectfully requests that the defendant ABIDEMI RUFAI be removed to the Western District of Washington so that he may be dealt with according to law.

/s/ Andrea DeSanto
ANDREA L. DESANTO
Special Agent
Federal Bureau of Investigation

Sworn to before me by telephone
this 15th day of May, 2021

James R. Cho
THE HONORABLE JAMES R. CHO
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK

EXHIBIT A



The Honorable David W. Christel

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

UNITED STATES OF AMERICA,

Plaintiff

v.

ABIDEMI RUFAI

a/k/a Sandy Tang,

Defendant.

CASE NO. MJ21-5101

**AMENDED COMPLAINT for
VIOLATIONS**

Title 18 U.S.C. § 1343

BEFORE, David W. Christel, United States Magistrate Judge, United States
Courthouse, Tacoma, Washington.

The undersigned complainant, being duly sworn, states:

COUNTS 1-5
(Wire Fraud)

A. Background

1. These charges involve ABIDEMI RUFAI's participation in a scheme to fraudulently collect unemployment benefits intended for American workers suffering from the economic effects of the COVID-19 pandemic. RUFAI, a Nigerian national who is not entitled to collect unemployment benefits in the United States, submitted dozens of

United States v. RUFAI
Complaint-1

UNITED STATES ATTORNEY
700 STEWART STREET
SUITE 5220
SEATTLE, WASHINGTON 98101
(206) 553-7970

1 claims to the Washington Employment Security Department and other state workforce
2 agencies using the stolen identities of residents of Washington and other states. In so
3 doing, RUFAI caused and attempted to cause the Employment Security Department to
4 pay out federal and other unemployment benefits in excess of \$350,000, and caused other
5 states to pay out additional fraudulent benefit payments.

6 2. On March 27, 2020, the United States enacted into law the Coronavirus
7 Aid, Relief, and Economic Security (CARES) Act. The CARES Act authorized
8 approximately \$2 trillion in aid to American workers, families, and businesses to mitigate
9 the economic consequences of the COVID-19 pandemic. The CARES Act funded and
10 authorized each state to administer new unemployment benefits. These benefits include:
11 (1) Federal Pandemic Unemployment Compensation (FPUC), which provided a benefit
12 of \$600 per week per unemployed worker in addition to existing benefits; (2) Pandemic
13 Unemployment Assistance (PUA), which extends benefits to self-employed persons,
14 independent contractors, and others; and (3) Pandemic Emergency Unemployment
15 Assistance (PEUC), which extends benefits for an additional 13 weeks after regular
16 unemployment benefits are exhausted.

17 3. CARES Act unemployment benefits are funded by the United States
18 government through the Department of Labor and administered at the state level by state
19 agencies known as state workforce agencies (SWAs). The Washington Employment
20 Security Department (ESD) is the SWA for the of the State of Washington.
21 Applicants can apply online for ESD-administered benefits by accessing Washington's
22 SecureAccess Washington (SAW) web identity validation portal and ESD's
23 Unemployment Tax and Benefit (UTAB) online application system.

24 4. Before submitting an application to ESD, the applicant must establish a
25 SAW account. As part of this process, the applicant must provide the SAW system with
26 an email address. The SAW system then sends, by interstate wire communication
27 originating in Olympia, Washington, an activation link to the email address provided.
28 The user must then click on a link to activate his or her account. This process causes a

1 series of wire transmissions originating at the user's location and terminating in Olympia,
2 Washington.

3 5. After activating the SAW account, the user may proceed to ESD's UTAB
4 application system. To file a claim, the applicant enters his or her personal identifying
5 information, to include name, date of birth, and Social Security number. If ESD confirms
6 that the information matches the personal identifying information of a person in ESD's
7 records, ESD will pay out benefits via wire (ACH) transfer to a bank or financial account
8 identified by the applicant.

9 **B. The Scheme to Defraud**

10 6. Beginning at a time unknown, but no later than March 9, 2020, and
11 continuing through on or after October 3, 2020, at Olympia, within the Western District
12 of Washington, and elsewhere, ABIDEMI RUFAI, aka Sandy Tang, and others known
13 and unknown, with intent to defraud, knowingly devised a scheme and artifice to defraud
14 and to obtain money and property by means of materially false and fraudulent pretenses,
15 representations and promises, as further described below.

16 7. The essence of the scheme and artifice to defraud was to fraudulently
17 obtain federally-funded PUA and other unemployment benefits from the Washington
18 ESD and other state workforce agencies by submitting fraudulent claims using the stolen
19 personal identifying information of American workers.

20 **C. Manner and Means**

21 The following conduct was part of the scheme and artifice to defraud:

22 8. RUFAI unlawfully obtained and possessed the personal identifying
23 information (PII), to include names, dates of birth, and Social Security numbers, of
24 residents of Washington and other states. RUFAI accessed, using interstate and foreign
25 wire transmissions, ESD's SAW portal, as well as similar portals of other SWAs.
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27
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1 9. RUFAl created email accounts, including a Google-administered account
2 with the address “sandytangy58@gmail.com,” for the purpose of participating in
3 fraudulent transactions while obscuring his identity.

4 10. RUFAl, using foreign and interstate wire transmissions, accessed ESD’s
5 SAW portal, as well as similar portals of other SWAs. RUFAl provided the
6 sandytangy58@gmail.com email address to ESD and other SWAs as the designated
7 email addresses to receive activation emails from the SWAs to activate fraudulent claims.

8 11. To prevent ESD and other SWAs from recognizing that the same email
9 account was being used to file multiple claims, RUFAl used dozens of variants of the
10 email addresses by placing periods at different locations within the email address for each
11 claim. For example, RUFAl opened SAW accounts and submitted claims using the
12 variants “san.dyta.ngy58@gmail.com,” “sa.ndty.a.ngy58@gmail.com,” and
13 “san.d.y.t.an.gy58@gmail.com.” This enabled RUFAl and his co-schemers to file
14 multiple claims using the same email account, without ESD and other SWAs detecting
15 that they were doing so.

16 12. When completing the applications, RUFAl directed that some of the
17 benefits be paid to online payment accounts, including Green Dot accounts. In some
18 cases, RUFAl directed that the fraudulent benefit payments be made to bank accounts
19 controlled by “money mules” under the control of RUFAl and his co-schemers. RUFAl
20 and his co-schemers then directed the money mules to send the proceeds to the residence
21 of RUFAl’s brother in Jamaica, New York.

22 **D. Execution of the Scheme and Artifice to Defraud**

23 13. On or about the dates set forth below, in Olympia, within the Western
24 District of Washington and elsewhere, for the purpose of executing and attempting to
25 execute this scheme and artifice to defraud, ABIDEMI RUFAl, and others known and
26 unknown, aiding and abetting each other, did knowingly transmit and cause to be
27 transmitted by wire communication in interstate and foreign commerce, writings, signs,
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signals, pictures and sounds, each transmission of which constitutes a separate count of this Complaint:

Count	Date	Wire Transmission
1	4/27/2020	Wire transmission from outside the state of Washington to the State Data Center in Olympia, Washington to establish Secure Access Washington account using the email address san.dy.t.a.n.g.y.5.8@gmail.com
2	4/28/2020	Wire transmission from outside the state of Washington to the State Data Center in Olympia, Washington to establish Secure Access Washington account using the email address s.an.dyt.a.n.g.y.5.8@gmail.com
3	4/29/2020	Wire transmission from outside the state of Washington to the State Data Center in Olympia, Washington to establish Secure Access Washington account using the email address sa.n.d.yta.n.g.y.5.8@gmail.com
4	5/1/2020	Wire transmission from outside the state of Washington to the State Data Center in Olympia, Washington to establish Secure Access Washington account using the email address sandy.t.an.g.y.5.8@gmail.com
5	5/2/2020	Wire transmission from outside the state of Washington to the State Data Center in Olympia, Washington to establish Secure Access Washington account using the email address s.a.nd.ytangy58@gmail.com

All in violation of Title 18, United States Code, Sections 1343 and Section 2.

And the complainant states that this Complaint is based on the following information:

I, Special Agent Andrea Desanto, being first duly sworn on oath, depose and say:

AFFIANT BACKGROUND AND SCOPE OF AFFIDAVIT

1. I am a Special Agent with the Federal Bureau of Investigation ("FBI"), and have been since 2006. I am currently assigned to the Seattle Field Office. My primary duties include investigating violations of federal law, including but not limited to, Title 18, United States Code, Sections 1343 (wire fraud), 1028A (aggravated identity theft), 1956 (money laundering), 1957 (transactional money laundering), and conspiracy to

1 commit these offenses. I previously worked on the Cyber squad, where I primarily
2 investigated computer intrusions and other cybercrimes. My experience as an FBI agent
3 includes the investigation of cases involving the use of computers and the Internet to
4 commit crimes. In addition to my experience with cybercrime investigations, I also have
5 experience with financial investigations. I have received formal training on tracing the
6 financial proceeds of crimes. I have applied that training in the context of numerous
7 investigations in which I have reviewed records from financial institutions both in the
8 United States and in foreign jurisdictions, in order to identify the proceeds of criminal
9 offenses under investigation.

10 2. Based on my training and experience, I am familiar with the ways in which
11 individuals involved in fraud schemes use shell e-mail accounts, computers, cellular
12 telephones, Internet Protocol (IP) addresses, bank accounts, synthetic identities, and
13 counterfeit documents to facilitate fraudulent activity. I have learned that individuals
14 perpetrating computer intrusions and identity theft-related bank fraud and wire fraud
15 schemes employ a number of techniques, either alone or in combination, to further their
16 illegal activities and to avoid detection by law enforcement. These techniques include:
17 utilizing web-based email accounts and other electronic messaging accounts to send,
18 receive, store, and obtain personal identifying information, such as dates of birth and
19 bank and credit card account numbers and related information; and the use of cloud-
20 based accounts to communicate and store information and tools related to the fraud. I
21 know that individuals involved in fraud schemes often establish shell e-mail accounts and
22 e-mail addresses in fictitious names and/or in the names of third parties in an effort to
23 conceal their identities and illicit activities from law enforcement. I know that
24 individuals involved in fraud often use virtual private network (“VPN”) accounts and
25 Internet hosting services to conceal their true identities and geographical locations from
26 law enforcement or other entities.

27 3. The purpose of the Affidavit is to describe the evidence relevant to the
28 question of whether probable cause exists to believe that ABIDEMI RUFAI committed

1 the offenses set forth above. As a result, the information in this Affidavit is limited to
 2 that relevant to the existence of probable cause. This Affidavit does not set forth all facts
 3 known to me that are relevant to this investigation.

4 **EVIDENCE OF THE CRIMINAL OFFENSES**

5 **A. The CARES Act**

6 4. Based on publicly-available information, I know that on March 27, 2020,
 7 the United States enacted into law the Coronavirus Aid, Relief, and Economic Security
 8 (CARES) Act. The CARES Act authorized approximately \$2 trillion in aid to American
 9 workers, families, and businesses to mitigate the economic consequences of the COVID-
 10 19 pandemic. The CARES Act funded and authorized each state to administer new
 11 unemployment benefits. These benefits include (1) Federal Pandemic Unemployment
 12 Compensation (FPUC), which provides an additional benefit of \$600 per week per
 13 unemployed worker; (2) Pandemic Unemployment Assistance (PUA), which extends
 14 benefits to self-employed persons, independent contractors, and others; and (3) Pandemic
 15 Emergency Unemployment Assistance (PEUC), which extends benefits for an additional
 16 13 weeks after regular unemployment benefits are exhausted. All of these programs will
 17 be referenced herein as “CARES Act benefits.” The CARES Act allows an unemployed
 18 worker to obtain back benefits retroactive to the date on which the applicant was affected
 19 by COVID 19, which, under program rules, may be as early as February 2, 2020.

20 5. CARES Act unemployment benefits are funded by the United States
 21 government through the Department of Labor and administered at the state level by state
 22 agencies known as state workforce agencies (SWAs). The Washington Employment
 23 Security Department (ESD), the component of the State of Washington responsible for
 24 administering unemployment benefits, is the SWA for the State of Washington.
 25 Applicants apply for ESD-administered benefits using Washington’s SecureAccess
 26 Washington (SAW) web portal and an ESD-administered site known as the
 27 Unemployment Tax and Benefit (UTAB) system.
 28

1 6. Based on interviews with ESD personnel, I know that, to apply for ESD
2 benefits online, a claimant must first open an account with the SAW system. The SAW
3 system is a website hosted at the State Data Center in Olympia, Washington that verifies
4 the identities of users. To open a SAW account, the applicant must access the SAW
5 website, which causes a wire communication to the servers at the State Data Center. The
6 applicant must provide SAW with basic identifying and contact information, to include
7 an email account. The SAW system sends an activation link to the provided email
8 account. The claimant must then access the email account and click the activation link to
9 complete the SAW account setup process. Once that process is complete, the applicant
10 may use his or her SAW account to access UTAB and submit a claim for ESD benefits.

11 7. To submit an ESD claim through UTAB, the applicant must enter his or her
12 personal identifying information (including name, date of birth, and Social Security
13 number). ESD checks this information against its database of Washington residents. If
14 ESD confirms that the information matches the personal identifying information of a
15 person in ESD's records, ESD will pay out benefits via wire (ACH) transfer to an account
16 identified by the applicant.

17 **B. Overview of Investigation**

18 8. I know from my contact with other law enforcement officers that,
19 beginning on around April 20, 2020, officials began receiving complaints from
20 employers about potentially fraudulent unemployment claims. The employers reported
21 that they had received notices from ESD indicating that persons still under their employ
22 had filed unemployment claims. For example, on or about April 20, 2020, the Seattle
23 Fire Department (SFD) notified the U.S. Attorney's Office for the Western District of
24 Washington that claims had been filed in the names of multiple firefighters who were
25 actively employed by SFD. SFD reported that it had interviewed the firefighters, who
26 had denied any involvement in the claims. Other employers, including Microsoft
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1 Corporation, the City of Bellingham, Zulily, and Seattle Yacht Club submitted similar
2 complaints.

3 9. Roughly around that same time, numerous other agencies, including the
4 Federal Bureau of Investigation, the Social Security Administration Office of Inspector
5 General, the United States Secret Service, the Department of Labor Office of the
6 Inspector General, the United States Postal Inspection Service, and Internal Revenue
7 Service Criminal Investigation, joined the investigation. Agents from these agencies,
8 including myself, have reviewed voluminous financial records and databases reflecting
9 the fraudulent transactions and have conducted dozens of interviews.

10 10. The investigation has developed evidence that hundreds of millions of
11 dollars' worth of fraudulent claims were filed with ESD using the stolen personal
12 identifying information of Washington residents. The FBI investigation has determined
13 that many of the fraudulent claims were filed using IP addresses that resolve to Nigeria.
14 While the actual amount of loss is unknown, the Washington State Auditor has issued a
15 report finding that ESD paid out at least \$642,954,417 in fraudulent imposter claims, of
16 which \$369,789,082 has been recovered.

17 **C. Role of Gmail Accounts in the Fraud**

18 11. ESD provided the government with data identifying the email accounts
19 associated with claims submitted over the period of the fraud. The data indicate that
20 thousands of different email accounts, including accounts operated by Google, were used
21 in connection with the filing of the fraudulent claims. For many of these Google email
22 accounts, perpetrators took advantage of a particular feature of Google email accounts
23 that allowed them to submit multiple fraudulent claims from a single Google email
24 account, without ESD detecting that a single email address was being used repeatedly.
25 Specifically, in routing emails to an email box, Google disregards periods in the email
26 address, meaning that the email address "john.doe@gmail.com" and
27 "johndoe@gmail.com" will resolve to the same Google email account, even though ESD
28

1 identifies them as two different accounts. Two email addresses like these that are
 2 distinguished only by periods are known as “Google variants” or “dot variants.” I know
 3 from my training and experience that criminals sometimes take advantage of this feature
 4 to make it appear that emails are originating from multiple accounts, when in fact they
 5 originate from the same account. This reduces the number of email accounts that a
 6 criminal must open and monitor while perpetrating a fraud, while avoiding fraud alerts
 7 that may be triggered when multiple claims originate from the same account.

8 **D. Use of the Sandytangy58@gmail.com Account**

9 12. Investigators analyzed ESD’s database to identify Gmail accounts that were
 10 used to submit multiple claims using the Google dot variant method discussed above.

11 Among these accounts was an account with the address sandytangy58@gmail.com.

12 13. According to a Department of Labor Office of Inspector General’s Office
 13 analysis of ESD’s claims database, dot variants of sandytangy58@gmail.com (such as
 14 san.dyta.ngy58@gmail.com, sa.ndyt.a.ngy58@gmail.com, and
 15 san.d.y.t.an.gy58@gmail.com.) were used to submit approximately 102 claims for ESD
 16 benefits exceeding \$350,000. The Department of Labor’s analysis also indicates the
 17 account was used to submit one or more claims to the SWAs for Hawaii, Maine,
 18 Michigan, Missouri, Montana, New York, Ohio, Pennsylvania, Wisconsin, and
 19 Wyoming.

20 **E. Investigation of the Sandytangy58 SMS Number and Identification of**
 21 **Abidemi Rufai.**

22 14. On June 19, 2020, the government applied for, and the Honorable Paula L.
 23 McCandlis issued, an order pursuant to 18 U.S.C. § 2703(d) directing Google to produce
 24 non-content material associated with the sandytangy58@gmail.com account.

25 15. The 2703(d) order required Google to identify, *inter alia*, the recovery SMS
 26 number for the account. Based on my experience and open source research, I know that
 27 Google uses recovery SMS numbers as an alternate means to communicate with the
 28

1 account holder, including for purposes of two-step authentication and password recovery
2 if the account holder forgets his or her password. I know from my training and
3 experience that email account users ordinarily provide their own cell phone number as an
4 SMS recovery number so that they can easily validate their account.

5 16. Google's response indicated that the recovery SMS number associated with
6 sandytangy58@gmail.com was the Nigeria-based number 234-909-874-2695 (the
7 "Sandytangy58 SMS Number"). Investigators conducted research into the Sandytangy58
8 SMS Number. They determined that this number was listed on a 2019 visa application of
9 a Nigerian man named ABIDEMI RUFAI. International travel records show that RUFAI
10 entered the United States on February 19, 2020, and left the country on August 9, 2020,
11 and was therefore apparently present in the United States during the period of the fraud.
12 When RUFAI arrived in the United States, he reported to the U.S. government that he
13 would be staying at his brother's apartment on Guy R. Brewer Boulevard in Jamaica,
14 New York.

15 17. I have reviewed financial reporting showing that, between March 3, 2020
16 and August 2, 2020, a Citibank checking account in RUFAI's name received a total of
17 \$288,825 in deposits. \$236,701 was transferred out of the account over the same period.

18 18. I have reviewed information from a financial institution reporting that on
19 May 19, 2020, a Richland, Missouri resident with the initials C.S. received an ACH
20 transfer of unemployment benefits from ESD in the amount of \$9,920. ESD records
21 indicated that this payment was based on a claim submitted to ESD on May 18, 2020, in
22 the name of a Washington resident with the initials M.S. using the email address
23 s.a.n.dy.t.an.gy58@gmail.com. Also on May 19, 2020, C.S.'s account received two ACH
24 transfers totaling \$8,650 from the Maine Department of Labor. When questioned by her
25 credit union about the transfers, C.S. stated that she had withdrawn \$11,000 of the funds
26 and sent them to an address on Guy R. Brewer Boulevard in Jamaica, New York. The
27 address C.S. provided is RUFAI's brother's apartment. On May 10, 2021, M.S. told
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1 investigators he had never filed an unemployment claim or given anyone permission to
2 do so on his behalf.

3 **F. Contents of the Sandytangy58@gmail Account**

4 19. On January 29, 2021, the Honorable Michelle L. Peterson issued a search
5 warrant to Google for the sandytangy58@gmail.com account. Google responded to the
6 search warrant on approximately February 5, 2021.

7 20. *Evidence of Fraud in the Account:* The contents of the
8 sandytangy58@gmail.com account included over 1,000 emails from ESD, including the
9 automated activation emails that the SAW system sends when new user sets up an
10 account. The account also contained approximately 100 emails from the SWAs for
11 Hawaii, Wyoming, Massachusetts, Montana, New York, and Pennsylvania. The account
12 also contained numerous emails from Green Dot, which is a payment system that I know
13 was used to collect and transfer a large share of the claims that were filed with ESD using
14 the sandytangy58@gmail.com account. In addition, the sandytangy58@gmail.com
15 account contained numerous emails from other online payment and cryptocurrency
16 services.

17 21. In addition, the sandytangy58@gmail.com account contained substantial
18 evidence that the user was actively engaged in stealing and retaining the personal
19 identifying information of American citizens. The account contained large volumes of
20 emails and file attachments with thousands of bank and credit card numbers, personal
21 identifying information such as dates of birth and U.S. addresses associated with first and
22 last names, and images of what appear to be driver licenses from various states, including
23 New York. The account also contained a very large volume of tax returns of United
24 States taxpayers. In many of the emails, the user appears to pose as an accountant,
25 signing the email "Sandy Tang CPA."

26 22. The sandytangy58@gmail.com account also contained emails indicating
27 that the user had submitted other types of fraudulent claims to the United States
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1 government. For example, the account contained numerous emails from the Federal
 2 Emergency Management Agency (FEMA) from September 2017, which appears to
 3 indicate that the user had filed multiple claims for disaster relief during this period. The
 4 account also contained emails from an online tax filing service indicating that the user
 5 had filed tax returns in the United States.

6 23. ***Additional Evidence Linking Account to RUFAI:*** In response to the
 7 January 2021 search warrant, Google also provided the contents of the Google Drive
 8 account associated with the sandytangy58@gmail.com account. Google Drive allows
 9 users to store documents, files, and other content online so that they can be remotely
 10 accessed from anywhere. The Google Drive documents associated with the
 11 sandytangy58@gmail.com account included four images of an individual who matches
 12 the physical appearance of RUFAI in his 2019 visa application photo and secondary
 13 inspection photos taken by U.S. Customs and Border Patrol on and January 19, 2017, and
 14 February 18, 2020. In addition, the contact list for the sandytangy58@gmail.com
 15 account included the email address bidemi.rufai@yahoo.co.uk, a variation of the email
 16 address listed on RUFAI's visa application (bidemi_rufai@yahoo.co.uk).

17 24. The sandytangy58@gmail.com account also included three confirmation
 18 emails from online purchases that list RUFAI's brother's address on Guy R. Brewer
 19 Boulevard in Jamaica, New York, as the billing address. For example, the account
 20 contains a January 26, 2017 email string in which the user of the
 21 sandytangy58@gmail.com account purchased a license to use Sigma Tax Pro software.
 22 The billing information on the invoice is "Thuy Le, Sandy S Tang CPA," and lists
 23 RUFAI's brother's address on Guy R. Brewer Boulevard as the billing address.
 24 Similarly, the sandytangy58@gmail.com account was used to purchase a Verizon
 25 wireless refill on February 14, 2017. The billing address for the order is "James Andrus"
 26 at the Guy R. Brewer address. Of note, U.S. Customs and Border Patrol records show
 27 that RUFAI arrived in New York on January 19, 2017 and remained in this country until
 28 May 4, 2017, and therefore was in the country for the period of these transactions.

G. Evidence Relevant to Charged Wire Transmissions and Uses of Stolen Identities.

25. As discussed above, the sandytangy58@gmail.com account contains emails from the Washington SAW system. Some of these emails contain activation links sent by the SAW system. I know from my interviews with ESD personnel that SAW sends these activation emails at the time the user creates a SAW account. Therefore, each email containing an activation link was immediately proceeded by the user accessing the SAW system by a wire transmission terminating in Olympia, Washington. Because RUFAI was staying in New York between February 19, 2020 and August 9, 2020, each of these wire transmissions travelled from outside of Washington to Olympia, Washington. The table below sets out five examples of these emails, including the date and the dot variant used in the SAW submissions.

Date	Address Reflected "To" Line of Email
4/27/2020	san.dy.t.a.n.g.y.5.8@gmail.com
4/28/2020	s.an.dyt.a.n.g.y.5.8@gmail.com
4/29/2020	sa.n.d.yta.n.g.y.5.8@gmail.com
5/1/2020	sandy.t.an.g.y.5.8@gmail.com
5/2/2020	s.a.nd.ytangy58@gmail.com

26. The evidence discussed above establishes probable cause to believe that: (1) the sandytangy58@gmail.com account was used to submit fraudulent claims to ESD and other states; (2) ABIDEMI RUFAI is the operator of the sandytangy58@gmail.com account; and (3) some of the proceeds of claims filed using the account were mailed to the New York address where RUFAI was staying during the period of the fraud. Based

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1 on all of this evidence, there is probable cause to believe that ABIDEMI RUFAI
2 committed the offenses alleged above.

3
4 s/ Andrea L. Desanto
5 ANDREA L. DESANTO
6 Complainant
7 Special Agent, FBI

8 The above-named agent provided a sworn statement attesting to the truth of the
9 contents of the foregoing affidavit by telephone on this 14th day of May, 2021. The Court
10 hereby finds that there is probable cause to believe the Defendant committed the offense
11 set forth in the Complaint.

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13
14 THE HONORABLE DAVID W. CHRISTEL
15 United States Magistrate Judge
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EXHIBIT B

UNITED STATES DISTRICT COURT

for the

Western District of Washington

United States of America

v.

Abidemi Rufai

Defendant

Case No. MJ21-5101

ARREST WARRANT

To: Any authorized law enforcement officer

YOU ARE COMMANDED to arrest and bring before a United States magistrate judge without unnecessary delay
 (name of person to be arrested) Abidemi Rufai,
 who is accused of an offense or violation based on the following document filed with the court:

☐ Indictment ☐ Superseding Indictment ☐ Information ☐ Superseding Information ☒ Complaint
☐ Probation Violation Petition ☐ Supervised Release Violation Petition ☐ Violation Notice ☐ Order of the Court

This offense is briefly described as follows:

Title 18, U.S.C. Section 1343
 Wire Fraud

Date: 05/14/2021*Issuing officer's signature*City and state: Seattle, WashingtonDavid W. Christel, United States Magistrate Judge*Printed name and title*

Return

This warrant was received on (date) _____, and the person was arrested on (date) _____
 at (city and state) _____.

Date: _____

*Arresting officer's signature**Printed name and title*

**This second page contains personal identifiers provided for law-enforcement use only
and therefore should not be filed in court with the executed warrant unless under seal.**

(Not for Public Disclosure)

Name of defendant/offender: Abidemi Rufai

Known aliases: Sandy Tang

Last known residence: 11 Omoday Outuga Street, Lekki, Nigeria

Prior addresses to which defendant/offender may still have ties: _____

Last known employment: _____

Last known telephone numbers: _____

Place of birth: Ebute Metta, Nigeria

Date of birth: ██████ 1977

Social Security number: _____

Height: _____ Weight: _____

Sex: Male Race: Black

Hair: Black Eyes: _____

Scars, tattoos, other distinguishing marks: _____

History of violence, weapons, drug use: _____

Known family, friends, and other associates (*name, relation, address, phone number*): _____

FBI number: _____

Complete description of auto: _____

Investigative agency and address: FBI SA Andrea Desanto, (206) 510-9645

Name and telephone numbers (office and cell) of pretrial services or probation officer (*if applicable*): _____

Date of last contact with pretrial services or probation officer (*if applicable*): _____